

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN, an individual,

*Plaintiff,*

-against-

TRACY DEEBS-ELKENANEY, et al.,

*Defendants.*

Case No. 1:22-cv-02435-LLS-SN

**PLAINTIFF'S NOTICE OF REQUEST  
FOR JUDICIAL NOTICE IN SUPPORT  
OF HER MOTION TO EXCLUDE A  
PORTION OF THE TESTIMONY OF  
MALCOLM COULTHARD AND THE  
TESTIMONY OF ROSE HILLIARD IN  
ITS ENTIRETY**

TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT Plaintiff Lynne Freeman ("Freeman") respectfully requests that, pursuant to Fed. R. Evid. 201, this Court take judicial notice of:

- (1) The article published by the National Academy of Science entitled "The Scientific Reinvention of Forensic Science;" and
- (2) The article published by Applied Linguistics entitled "Author Identification, Idiolect and Linguistic Uniqueness."

At any stage of a proceeding, a court may judicially notice a fact that is not subject to reasonable dispute because it (1) is generally known within the trial court's territorial jurisdiction; or (2) can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned. Fed. R. Evid. 201.

This Court may take judicial notice of printed material purporting to be a newspaper or periodical. Pursuant to Fed. R. of Evid. §902, such material is self-authenticating.

Accordingly, Freeman requests that the Court take judicial notice in support of Freeman's Motion to Exclude Evidence of a Portion of Malcolm Coulthard's Testimony and the Testimony of Rose Hilliard in its Entirety of the following:

1. The article published by the National Academy of Science entitled “The Scientific Reinvention of Forensic Science” which is publicly available at the following website: [pnas.org/doi/10.1073/pnas.2301840120](https://pnas.org/doi/10.1073/pnas.2301840120).
2. The article published by Applied Linguistics entitled “Author Identification, Idiolect and Linguistic Uniqueness,” a copy of which is attached hereto as Exhibit “1.”

Respectfully submitted,

**Reeder McCreary, LLP**

Dated: December 22, 2023

*Mark Passin*

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cc: All counsel of record (via ECF)